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9 Scott Schorzman, and William Douglass
10

11 UNITED STATES DISTRICT COURT
12 EASTERN DISTRICT OF CALIFORNIA

13 BUFFALO AIRWAYS LTD.,
14 Plaintiff,

15 v.

16 AIRSTRIKE FIREFIGHTERS, LLC;
17 WILLIAM DOUGLASS; SCOTT
18 SCHORZMAN; and DOES 1 through 25,
19 inclusive,

20 Defendants.

NO. 2:23-CV-02031-MCE-JDP

STIPULATED MOTION TO
TRANSFER VENUE AND ORDER

21 **STIPULATION**

22 Plaintiff Buffalo Airways Ltd. and Defendants Airstrike Firefighters LLC, William
23 Douglass, and Scott Schorzman jointly stipulate and move the Court as follows:

24 Plaintiff originally filed this action in the Superior Court for the State of California,
25 Sacramento County. Defendants removed this action to the United States District Court for the
26

STIPULATED MOTION TO TRANSFER VENUE
AND ORDER - 1

1 Eastern District of California pursuant to 28 U.S.C. § 1441 and 28 U.S.C. § 1332, based on the
2 complete diversity of the parties,¹ and that the amount in controversy pled in Plaintiff's complaint
3 exceeds \$75,000.00. The Parties further agree that the Aircraft Lease (Exhibit 1 to the operative
4 Complaint) provides that exclusive jurisdiction and venue of this action is in the Western District
5 of Washington at Seattle. The parties therefore consent to transfer of venue of the captioned
6 lawsuit to the United States District Court for the Western District of Washington at Seattle
7 pursuant to 28 U.S.C. § 1404(a).
8
9

10 NOW, THEREFORE, in consideration of the foregoing, Plaintiff and Defendants agree
11 and hereby stipulate to transfer this action to the United States District Court for the Western
12 District of Washington at Seattle.
13

14
15 Dated this 3rd day of October, 2023.
16

17 THE SCHAPS LAW OFFICE, A.P.C.

18 /s/

19 _____
20 Michael A. Schaps
21 *Attorneys for the Defendants*

22 LASHER HOLZAPFEL
23 SPERRY & EBBERSON PLLC

24 /s/

25 _____
26 Danial D. Pharris (pro hac vice)

¹ Plaintiff is a Canadian entity with its principal place of business in Yellowknife, Northwest Territories, Canada. Defendant Airstrike is an Alaska Limited Liability Company, William Douglass is a citizen of the State of Washington, and Scott Schorzman is a citizen of the State of Idaho.

1 Paul J. Spadafora, State Bar No. 293764
2 Julie M. Pendleton (pro hac vice)
3 *Attorneys for Defendants*

4 THE RYAN LAW GROUP

5 /s/
6 Timothy J. Ryan
7 Rebekka R. Martorano
8 *Attorneys for Plaintiff*

ORDER


Having considered the Parties' Stipulated Motion to Transfer Venue, the Court finds that venue is appropriate in the United States District Court for the Western District of Washington at Seattle pursuant to 28 U.S.C. § 1404(a) pursuant to the parties' venue selection clause in the operative lease at issue in this action.

IT IS HEREBY ORDERED that:

1. The Stipulated Motion to Transfer Venue is GRANTED.
2. The Clerk of Court is directed to transfer this case to the United States District Court for Western District of Washington at Seattle pursuant to 28 U.S.C. § 1404(a).
3. All dates on this Court's calendar for this action shall be withdrawn in light of the transfer.

IT IS SO ORDERED.

Dated: October 12, 2023



MORRISON C. ENGLAND, JR.
SENIOR UNITED STATES DISTRICT JUDGE